



U.S. Department of Justice

Environment and Natural Resources Division

BSG:AML
DJ No. 90-11-3-1620/2

Environmental Enforcement Section
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August 23, 2002

VIA EMAIL, TELECOPY, AND REGULAR MAIL

Gary Franke, Esq.
120 E. Fourth St.
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Cincinnati, OH 45202

EPA Region 5 Records Ctr.



275020

Re: United States v. Aeronca, Inc. et al.
Civil Action No. 1:01 CV 00439
Summary of Telephone Conversation on Documents

Dear Mr. Franke:

This will summarize the document discussion that we just held.

With respect to the United States' Second Request for Documents and my letter of August 1, 2002, please respond, in accordance with the directives in my August 1, 2002 letter, to the following requests:

- (1) Interrogatory No. 2 to Clarke's Services
- (2) Document Request Nos. 2, 3 and 6 to Clarke's Services
- (3) Interrogatory No. 2 to Richard M. Clarke
- (4) Document Request Nos. 2, 3, and 4 to Richard M. Clarke.

The remainder of my requests in my August 1, 2002 letter are withdrawn.

With respect to EPA's April 6, 2001, 104(e) Request and my letter of August 2, 2002, please respond, in accordance with the directives in my August 2, 2002 letter, to the following requests: 1, 4, 5(a),(f), and (g), 6, 8, 11, 14, 16, 17, 18.

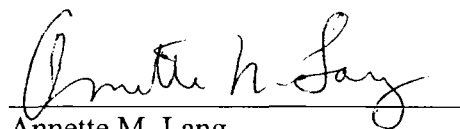
With respect to the United States' Third Request for Documents (dated Aug. 7, 2002), at this time, I am confirming that, until further discussion and notice, you need to respond only to Document Request Nos. 13, 14, 17, and 21. Additionally, I am asking that you respond to Document Request No. 18 only with respect to Clarke's Services, Inc. and Dick Clarke Co. (as opposed to all Clarke Entities).

As I indicated on the telephone to you, if your clients do not know the answers to some of the questions and/or do not have documents responsive to some of the questions, I can accept that as an answer. I just need to know that that is the answer.

Obviously, the Interrogatory Responses need to be verified, and the Responses to the 104(e) Requests need to be certified.

Thank you for your prompt attention to the matters raised herein.

Sincerely,

A handwritten signature in cursive script, appearing to read "Annette M. Lang", written over a horizontal line.

Annette M. Lang
Trial Attorney

cc: Skinner Service List

Skinner Service List

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